

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

NORFOLK DIVISION

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 2:18cr
v.)	
)	
NAKAI KOYENHAN,)	
)	
Defendant.)	

STATEMENT OF FACTS

The parties stipulate that the allegations in the criminal information are true and correct, and that if this case were to proceed to trial, the evidence presented by the United States would establish the following facts beyond a reasonable doubt:

1. Church Point Manor, LLC ("Church Point Manor") was a business located in Virginia Beach that operated in and the activities of which affected interstate commerce. It operated a bed and breakfast, including a restaurant named The Cellars.

2. At all material times, the defendant was employed by Church Point Manor to provide bookkeeping, accounting and payroll services.

3. At the defendant's request, the owner of Church Point Manor provided the defendant with signed checks written on the bank account of the business, with the name of the payee left blank. These blank checks were to be used by the defendant for the sole purpose of paying the legitimate business expenses of Church Point Manor.

4. Between approximately February 2014 and September 2017, the defendant forged approximately 304 checks of Church Point Manor, totaling \$323,445.00, by making false additions thereto. Without the knowledge or authority of the owner of Church Point Manor, the

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defendant wrote in the names of payees unrelated to any legitimate business expenses, including the names of an acquaintance and businesses that the defendant owned or co-owned. These checks were subsequently negotiated and used for unauthorized purposes, including the personal benefit of the defendant. Among other things, the defendant used the money to make car loan payments, rent payments, the purchase a wedding ring and wedding supplies, and to travel to various destinations, including Nigeria.

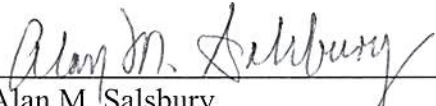
5. In an attempt to conceal her fraudulent conduct, the defendant, on an ongoing basis, made false entries in the accounting ledger she maintained for Church Point Manor. She would, for example, change the names of the payees and amounts on the fraudulent checks she had written as described above in Paragraph 4, in order to make it appear that they were payments for legitimate business expenses.

Relevant Conduct


6. Between approximately April 2017 and September 2017, the defendant, without the knowledge or authority of the owner of Church Point Manor, fraudulently transferred by wire, from the Church Point Manor bank account at Town Point Bank to her own account at Navy Federal Credit Union, funds totaling approximately \$25,605.84.

7. Between approximately March 2016 and September 2017, the defendant, without the knowledge or authority of the owner of Church Point Manor, fraudulently transferred by wire, from the Church Point Manor bank account at Town Point Bank to her Capital One credit card account, funds totaling approximately \$28,049.00.

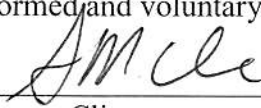
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I hereby stipulate that the above Statement of Facts is true and accurate, and that if this case had proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


Nakai Koyenhan

I have reviewed the above Statement of Facts with Nakai Koyenhan and her decision to stipulate to the accuracy of these facts is an informed and voluntary one.


Shawn Cline
Counsel for the defendant

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